

# CALL FOR COMMENT

# ACCSC

**To:** ACCSC-Accredited Institutions and Interested Parties

**From:** Michale S. McComis, Ed.D., Executive Director

**Date:** March 30, 2020

**Subject:** Proposed Revisions to the Standards of Accreditation

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The Accrediting Commission of Career Schools and Colleges (ACCSC) presents the following topics for comment by the ACCSC membership and other interested parties:

- **Consortium, Partnership, or Contractual Arrangements**
- **Transfer of Credit, Articulation, and Prior Learning Assessment**

The Commission welcomes and encourages the comments of ACCSC-accredited institutions and other interested parties on the topics listed above. The Commission encourages all member institutions and interested parties to read carefully the Commission's request for feedback and to submit comments and recommendations for consideration by the Commission. The Commission will give careful consideration to the comments received, particularly those that reflect thoughtful insights which take into account what is best for the entire ACCSC membership and support and enhance ACCSC's mission.

With regard to the proposed revisions, after considering the written comments, the Commission may adopt the revision as proposed, adopt the revision with additional changes, defer action for further study and consideration, or reject the proposed revision. If the Commission adopts the revisions, ACCSC will establish an effective date allowing reasonable time for institutions to come into compliance and will announce the revision via an *Accreditation Alert*.

All comments are to be in the form of a PDF document on letterhead with the signature of the commenter. Please send all written comments to the attention of Michale S. McComis, Ed.D., Executive Director, via e-mail to [mccomis@accsc.org](mailto:mccomis@accsc.org). Written comments regarding the Proposed Revisions to the *Standards of Accreditation* are due by **April 29, 2020**.

Please note that the Commission will be making other revisions to the ACCSC *Standards of Accreditation* in the *Introduction* and the *Rules of Process and Procedure* sections. These revisions are not included in this Call for Comment because only changes to the Substantive Standards are subject to the Call for Comment process. The changes to the *Introduction* involve removing duplicative language which is found in the *Rules* and reshaping this section to state the purpose and intent of ACCSC accreditation and the hallmarks of quality which are expressed throughout the *Standards of Accreditation*. The revisions to the *Rules of Process and Procedure* in most cases are mostly meant to align with changes to federal regulations for recognized accrediting agencies effective July 1, 2020. There are some changes to the *Rules*, however, that are intended to provide greater clarity in the Commission's processes. ACCSC will issue an Accreditation Alert that includes all revisions July 1, 2020.

For assistance or additional information regarding this Call for Comment, please contact Michale S. McComis, Ed.D., Executive Director, at 703.247.4520 or [mccomis@accsc.org](mailto:mccomis@accsc.org).

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**Proposed Revisions to the Substantive Standards**  
**ACCSC Standards of Accreditation**

**Consortium, Partnership, or Contractual Arrangements**

The U.S. Department of Education has made changes to the substantive change regulations for accreditors which will go into effect July 1, 2020. The primary purpose of the revisions here is to move the Commission's reporting requirements to the *Rules of Process and Procedure* section of the *Standards of Accreditation*. The primary substantive revision reduces the consortium, partnership, or contractual arrangement limit from 75% to 50%, which is in alignment with federal limitations.

**SECTION II – PROGRAM REQUIREMENTS**

**A. General Program Requirements**

9. Consortium, Partnership, or Contractual Arrangements

~~a. In any instance where a portion of a program is offered by an entity other than the ACCSC-accredited institution via any consortium, partnership, or contractual arrangement the school must submit documentation that demonstrates that the program portion is approved by another United States Department of Education recognized accrediting agency. In lieu of this documentation, the school must submit the Consortium/Partnership Report.~~

~~a. In any all instances where the school has entered into , the school must submit a copy of a consortium, partnership, or contractual arrangement to offer a portion of a program, the Commission. Additionally, the school must submit a statement indicating that it retains responsibility for the quality of the courses of study and programs offered as well as the achievement of expected and acceptable outcomes irrespective of any such contractual arrangement, partnership, or consortium agreement entered into with third parties for the provision of components of a program or course of study.~~

~~b. A school that allows a portion of a program to be offered by an entity other than the ACCSC-accredited institution via consortium, partnership, or contractual arrangement using a distance education delivery method, may be required to receive an on-site evaluation in accordance with prescribed accrediting policies and procedures.~~

~~eb. Regardless of any consortium, partnership, or contractual arrangements, at a minimum, 2550% of the required curriculum must be completed atfrom the school awarding the credential upon graduation, with the exception of an approved teach-out plan or agreement.~~

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## Transfer of Credit, Articulation Agreements, and Prior Learning Assessment

The U.S. Department of Education has made changes to the disclosure requirements for institutions that participate in the federal student financial aid program (§668.43) that will require institutions to disclose “any types of institutions or sources from which the institution will not accept credits,” “[a] list of institutions with which the institution has established an articulation agreement; and “[w]ritten criteria used to evaluate and award credit for prior learning experience...” Accordingly, the Commission has included these same provisions in *Section II (A)(11), Substantive Standards, Standards of Accreditation*.

With regard to prior learning assessment, this primarily applies where an individual had a learning experience but did not receive credit hours, clock, hours, or a completion credential for that learning. The Commission believes it is appropriate for a school to be able to award credit for such prior learning experience, but also believes it is appropriate to limit the amount of credits awarded, as this aligns with common practice in this area and some state regulations.

## SECTION II – PROGRAM REQUIREMENTS

### A. General Program Requirements

#### 11. Transfer of Credit, Articulation, and Prior Learning Assessment

- a. ~~At its discretion, a~~ school may accept transfer credit for a postsecondary course completed at another institution when comparable in scope and content to the school’s own coursework.
  - b. In evaluating credit earned by students for transfer, a school must adhere to the following principles and practices:
    - i. A school has established appropriate criteria (e.g., comparability, applicability, source, and age of the previously earned credit; academic preparedness of the student at the time of credit transfer; grade earned for the credit to be transferred; etc.) and applies a systematic, consistent process for determining whether to accept credit earned at other institutions for transfer.
    - ii. A school publishes its transfer-of-credit policy in its catalog and clearly communicates the criteria and process for evaluating and accepting credit earned at other institutions for transfer as well as any types of institutions or sources from which the institution will not accept credits;
    - iii. The acceptance of credit for transfer is primarily based on the competencies achieved by the student in previously completed coursework and whether the competencies reasonably align with the coursework and the program into which the credit is to be transferred.
    - iv. Accreditation of the institution or program from which the student is seeking to transfer credits is a consideration for credit transfer decisions; however, the source of accreditation of the institution or program from which the student is seeking to transfer credits is not the sole basis for accepting or denying credit for transfer.
  - c. The school must document in the student record from what school and on what basis transfer credit was accepted.
  - d. The school must provide to students a list of institutions with which the school has an established articulation agreement.
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- e. A school may award credit based on an incoming student's prior learning experience, provided that the school has appropriate written criteria used to evaluate equivalency and award credit for only such prior learning experience garnered through education and training in areas such as, service in the armed forces, employment and on-the-job training, apprenticeships, or other demonstrated competency or learning sources. Credits awarded may not exceed 10% of the credits required for the program.
  - f. At a minimum, 25% of the credits required for non-degree and undergraduate degree programs must be completed at from the school awarding the ~~degree~~credential, with the exception of an approved teach-out plan or agreement.
  - g. The majority of the credits required for a graduate degree program must be completed at the school awarding the degree.
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